

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE: PASSENGER VEHICLE	)	Case No. 5:24-md-3107
REPLACEMENT TIRES ANTITRUST	)	
LITIGATION	)	MDL No. 3107
	)	
This Document Applies to:	)	CHIEF JUDGE SARA LIOI
	)	
ALL CASES	)	

**AGENDA FOR JULY 2, 2024 CONFERENCE**

The Court appreciates the high level of apparent cooperation and craftsmanship in the parties' initial Joint Status Report (Doc. No. 70), and intends to discuss the following list of agenda items at the July 2, 2024 status conference<sup>1</sup>:

**I. Introductions**

**II. Proposed Leadership Structure<sup>2</sup>**

- A. Brief presentations (1–3 minutes) by DPP plaintiffs' proposed co-lead counsel on their qualifications.
- B. Brief presentations (1–3 minutes) by EPP plaintiffs' proposed co-lead counsel on their qualifications.
- C. Brief presentations (1–3 minutes) by APP plaintiffs' proposed co-lead counsel on their qualifications.

**III. Service**

- A. Update on status of service.
- B. Update by counsel for foreign defendants regarding willingness to waive service.

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<sup>1</sup> Please note that the conference will be held in Courtroom 530, and not in Room 526 as Case Management Order No. 1 (Doc. No. 3) indicated.

<sup>2</sup> Any proposed co-lead counsel attending the conference by phone shall file with the Court a brief statement regarding their qualifications no later than July 3, 2024.

#### **IV. Filing Procedures**

The Court and MDL Clerk, Corey McCardle (Corey\_McCardle@ohnd.uscourts.gov), will briefly discuss filing procedures.

#### **V. Initial Case Schedule**

A. Discussion of deadlines for filing consolidated complaints and Rule 12 briefing.

i. Between the parties' proposals, the Court finds defendants' proposed schedule (Option A below) regarding consolidated complaints and Rule 12 briefing to be more equitable. However, if plaintiffs prefer, the Court will permit them to reallocate seven days from their Rule 12 opposition deadline to their deadline for filing consolidated complaints (Option B below).

ii. Accordingly, the Court contemplates two options:

1. Option A (defendants' proposal):

- a. Consolidated Complaints due August 2, 2024 (31 days).
- b. Motions to Dismiss due September 13, 2024 (42 days).
- c. Oppositions due October 25, 2024 (42 days).
- d. Replies due November 22, 2024 (28 days).

2. Option B:

- a. Consolidated Complaints due August 9, 2024 (38 days).
- b. Motions to Dismiss due September 20, 2024 (42 days).
- c. Oppositions due October 25, 2024 (35 days).
- d. Replies due November 22, 2024 (28 days).

B. Discovery protocol deadlines. The parties agree on the following, which the Court accepts:

i. Proposed Protective Order due August 2, 2024.

ii. Proposed ESI Protocol due September 1, 2024.

iii. Proposed Rule 502 Privilege Procedure due October 1, 2024.

iv. Proposed Deposition Protocol due November 4, 2024.

C. Preliminary discussion of timing of expert reports on merits and damages.

**VI. Future Status Conferences**

- A. Discussion of future agenda items, including the extent and scope of discovery stay.
- B. The second status conference will be held virtually on August 13, 2024, at 1:30 p.m., with the parties jointly filing a tentative agenda no later than August 6, 2024.
- C. The third status conference will be held virtually on October 1, 2024, at 1:30 p.m., with the parties jointly filing a tentative agenda no later than September 24, 2024.

**VII. Other Matters**

**IT IS SO ORDERED.**

Dated: June 28, 2024

  
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**HONORABLE SARA LIOI**  
**CHIEF JUDGE**  
**UNITED STATES DISTRICT COURT**